

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

EPSON AMERICA, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:24-cv-10562-LTS
	)	
SHENZHEN SEN RUI TAI TRADING CO.,	)	
LTD d/b/a Dr. J,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF XIAMEI DENG IN SUPPORT OF NON-PARTY WUHAN  
AIMAIXUM TECHNOLOGY CO. LTD. MOTION TO AMEND  
THE FINAL JUDGMENT AND WRIT OF EXECUTION**

I, Xiamei Deng, being duly sworn, hereby deposes and says:

1. I run the day-to-day operations of a store on Walmart's online marketplace that is owned by Wuhan Aimaixun Technology Co., Ltd. ("Wuhan ATC"). The store was established in March 2024 and is named Dr. J Professional LTD. The Walmart Store ID is 10001644169. Attached as Exhibit 1 is a printout from Wuhan ATC's store showing the Walmart Store ID and other information about ownership of the store.
  
2. My husband, Liang Chen, who owns 97 percent of Wuhan ATC, is one of the two shareholders of Wuhan ATC. Jie Zhen owns the remainder.
  
3. Wuhan ATC received its Chinese Business License on June 12, 2020. Attached as Exhibit 2 is a copy of the Business License written in Mandarin and translated copy of the same Business License.

4. Wuhan ATC and the defendant in this case, Shenzhen Sen Rui Tai Trading Co., Ltd. ("Shenzhen"), are unrelated, separate entities that do not have any common ownership and are not successors in interest.

5. Based on an online search of National Enterprise Credit Information Publicity System of China ("System"), Shenzhen is owned by Wei Liu and was deregistered on January 11, 2024, which I understand to mean that it no longer conducts business. Attached as Exhibit 3 is a copy of the enterprise credit information publicly announced on the System showing Shenzhen is deregistered.

6. As part of the Walmart store registration process, I was required to provide valid contact information, which included an email address (aimaixun168@126.com) mailing address in China: Room B498, 3rd Floor, Building 3, Phase III, International Enterprise Center, No. 1, Optics Valley Avenue, East Lake High - tech Development Zone, Wuhan, Hubei Province, China. All information provided to Walmart during the registration process remains accurate.

7. On or about April 21, 2025, I received notification from Walmart stating that "Your payments have been suspended due to a TRO" issued in case number 24-cv-10562-LTS. Attached as Exhibit 4 is a copy of the notification I received from Walmart.

8. I contacted Walmart to determine why Wuhan ATC's account was suspended. Walmart responded in writing on May 13, 2025 and wrote that "this action on your account has been taken as a result of a Writ of Execution that was received for case 1:24-cv-10562 out of the United States District Court of Massachusetts." Attached as Exhibit 5 is a copy of the May 13, 2025 correspondence from Walmart. Wuhan ATC's account remains suspended.

9. After learning the reason for Walmart's actions, our Chinese counsel researched the issue and discovered that Wuhan ATC's store was specifically identified in the Court's Final Judgment. In its February 24, 2025 Final Judgment, the Court ordered that "all advertisements, product listings, or other offers for sale for Dr. J branded projectors, whether sold directly by the Defendant or other resellers of the Dr. J brand, be removed from Walmart.com and Amazon.com, including, but not limited to:

a. All projectors sold by Walmart seller: Dr.J Professional LTD (Seller url: <https://www.walmart.com/seller/101624818?itemId=697942428&pageName=item&returnUrl=%2Fip%2Fseort%2F697942428>;

This link is to Wuhan ATC's store on Walmart.com website.

10. Wuhan ATC was never named as a party in the underlying lawsuit, never received any notice about the lawsuit, and Epson of America, Inc. has never accused Wuhan ATC of any wrongdoing.

11. Wuhan ATC is unable to access or use the funds in its Walmart account, which is affecting our ability to conduct business.

Signed under the penalties and pains of perjury, this 23rd day of June 2025.

Deng Xiamei 邓夏梅 2025年6月23日  
Xiamei Deng